

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO. 04-CV-10521-GAO

BETTY ANNE WATERS, as Administratrix of the
Estate of KENNETH WATERS,

Plaintiff

v.

TOWN OF AYER, NANCY TAYLOR-HARRIS, in Her
Individual Capacity, ARTHUR BOISSEAU, In His
Individual Capacity, WILLIAM ADAMSON, in His
Individual Capacity and PHILIP L. CONNORS, in His
Individual Capacity,

Defendants

DEFENDANT NANCY TAYLOR-
HARRIS' MOTION FOR
SUMMARY JUDGMENT

Now comes the defendant, Officer Nancy Taylor-Harris ("Officer Taylor"), and hereby moves, pursuant to Fed.R.Civ.P. 56(b), for summary judgment on all claims against her as set forth in the Amended Complaint.

As grounds therefor, Officer Taylor states that there exists no genuine issue as to any material fact, and that she is entitled to judgment in her favor as a matter of law. As further grounds therefor, Officer Taylor relies on the attached Local Rule 56.1 Statement of Material Facts of Record as to which There is No Genuine Issue to be Tried, and attached supporting memorandum of law.

WHEREFORE, Officer Taylor respectfully requests that this Court enter judgment in her favor on all claims set forth against her in the Amended Complaint.

DEFENDANT NANCY TAYLOR-HARRIS,
By her attorneys,

/s/ Joseph L. Tehan, Jr.

Joseph L. Tehan, Jr. (BBO # 494020)

Gregg J. Corbo (BBO # 641459)

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